

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF Massachusetts

In re:

Frankie Andrews

Case No. 15-30497-FJB  
Chapter 7

**Debtor(s)**

**CHAPTER 7 TRUSTEE'S APPLICATION TO RETAIN BK GLOBAL REAL ESTATE  
SERVICES AND B & B REAL ESTATE TO PROCURE  
CONSENTED PUBLIC SALE PURSUANT TO 11 U.S.C. §§327, 328 AND 330**

*Gary Weiner*  
Now comes Gary Weiner, Chapter 7 Trustee (the “Trustee”) for the above referenced bankruptcy estate of Frankie Andrews, (the “Debtor”), by and through the undersigned counsel, and files this Application for entry of an order authorizing employment of (1) BK Global Real Estate Services (“BKRES”) under the terms set forth in the agreement (the “BKRES Agreement”) attached to BKRES’ Affidavit of Disinterestedness at *Exhibit A* (the “BKRES Affidavit”) and (2) B & B Real Estate (“Listing Agent”) under the terms of the agreement (the “Listing Agreement”) attached to Listing Agent’s Affidavit of Disinterestedness at *Exhibit B* (the “Listing Agent Affidavit”). In support thereof, the Trustee respectfully states as follows:

PRELIMINARY STATEMENT

Trustee requests approval to retain BKRES and local licensed Listing Agent (individually and collectively referred to as “Broker or Brokers”), at no cost to the estate, to negotiate with and persuade the first lienholder on certain real property in which the estate has no equity to (1) allow Trustee to sell such property at the highest price that the market will bear, (2) waive the resulting deficiency claim and (3) pay an 11 U.S.C. § 506 surcharge to provide a carveout for the benefit of the estate and pay all other sale expenses, including a 6% brokerage